

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA :

v. :

AARON JEROME KHAN :

1:14CR 388 -1



The Grand Jury charges:

COUNT ONE

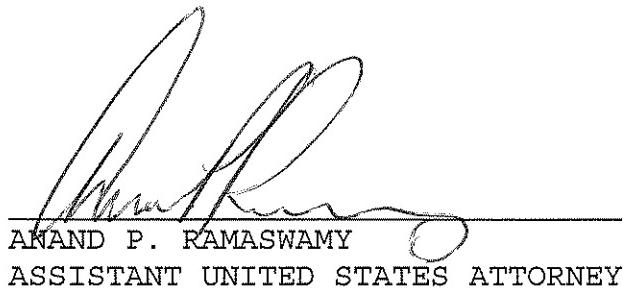
From in or about December 2011, continuing up to and including on or about October 2, 2014, the exact dates to the Grand Jurors unknown, in the County of Orange, in the Middle District of North Carolina, and elsewhere, AARON JEROME KHAN knowingly did transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit: AARON JEROME KHAN sent email messages threatening to injure and kill a woman (Victim-1); in violation of Title 18, United States Code, Section 875(c).

COUNT TWO

From in or about December 2011, continuing up to and including on or about October 2, 2014, the exact dates to the Grand Jurors unknown, in the County of Orange, in the Middle District of North Carolina, and elsewhere, AARON JEROME KHAN, with the intent to kill, injure, harass, and intimidate another person, specifically Victim-1, did use an interactive computer

service and any other facility of interstate and foreign commerce to engage in a course of conduct that placed Victim-1 in reasonable fear of death and serious bodily injury, and that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim-1, to wit: AARON JERMONE KHAN sent email messages threatening to injure and kill Victim-1; in violation of Title 18, United States Code, Sections 2261A(2) and 2261(b).

A TRUE BILL:



ANAND P. RAMASWAMY
ASSISTANT UNITED STATES ATTORNEY



RIPLEY RAND
UNITED STATES ATTORNEY